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Post-confirmation Plan Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA**

In re:

UNIMEX CORPORATION, INC.,

Reorganized Debtor.

Chapter 11 (Subchapter V)

Case No. 20-12535-BFK

**NOTICE OF PROPOSED INTERIM DISTRIBUTION OF AVOIDANCE
RECOVERIES TO CLASS 3 CREDITORS UNDER THE CONFIRMED
SUBCHAPTER V PLAN**

PLEASE TAKE NOTICE that pursuant to the Reorganized Debtor's Amended Subchapter V Chapter 11 Plan of Reorganization that was confirmed by the Court [Docket No. 69] (the "Plan"), Jolene E. Wee, post-confirmation Plan Trustee (the "Trustee"), will be making an interim distribution of avoidance recoveries of \$50,000 on a pro-rata basis to Class 3 creditors as reflected in the attached proposed plan distributions ("Proposed Distribution" or "Exhibit A"). All Class 3 creditors with allowed claims will be receiving a pro-rata distribution of the \$50,000 in the amounts listed in Exhibit A and checks in those amounts will be mailed to the latest known address based on the creditor's matrix or the Reorganized Debtor's records.

PLEASE TAKE FURTHER NOTICE that the Trustee is currently holding \$117,494.58 in her fiduciary account for this matter. These are funds from the Trustee's successful prosecution of avoidance actions to date in accordance with the terms of the Order Confirming Plan, which was entered by this Court on April 5, 2021 (the "Plan Confirmation

Order”). [Docket No. 77] The Trustee will be reserving the remaining funds after making this interim distribution for case administration and for potential collection efforts, if any.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 3010(b) of the Federal Rules of Bankruptcy Procedure, the Trustee will not be mailing checks in any amounts less than \$15.00. The Trustee will hold such funds in her fiduciary bank account until such a time when the creditor(s)’s accumulated pro-rata distribution exceeds \$15.00 or when the Trustee is making a final distribution under the Plan, whichever is sooner.

PLEASE TAKE FURTHER NOTICE that in the event the Trustee or the Reorganized Debtor does not have a known mailing address for any Class 3 creditor the Trustee will hold the pro rata distributions of these creditors in her fiduciary bank account until such a time when these creditors can be located. It is the responsibility of the holder of Class 3 claims whose address changes to notify the Trustee of such a change.

PLEASE TAKE FURTHER NOTICE that in the event a distribution is unclaimed within 180 days after the distribution is made, such distribution will become the property of the Reorganized Debtor, and no further distribution will be made to such creditor until such creditor advises the Trustee of its correct information.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Trustee’s Proposed Distribution shall be filed with the Clerk of Court at 200 South Washington Street, Alexandria, VA 22314 within twenty-one (21) days by **March 12, 2025 at 5:00 p.m. prevailing Eastern Time** (the “Objection Deadline”) and must contain a written opposition with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). A copy of any written response must be sent to:

Jolene E. Wee, Plan Trustee
JW Infinity Consulting, LLC
447 Broadway Street 2nd FL #502
New York, NY 10013
jwee@jw-infinity.com

Steven B. Ramsdell, Counsel to Reorganized Debtor
Tyler, Bartl & Ramsdell, P.L.C.
300 N. Washington St., Suite 310
Alexandria, VA 22314
SRamsdell@TBRCLaw.com

Michael Freeman, Esq.
Jack I. Frankel, Esq.
Office of the U.S. Trustee
1725 Duke St., Suite 650
Alexandria, VA 22314
Michael.T.Freeman@usdoj.gov
Jack.I.Frankel@usdoj.gov

PLEASE TAKE FURTHER NOTICE that the Trustee will make the Proposed Distribution as reflected in Exhibit A if she does not receive any responses or objections by the Objection Deadline without further notice or Court approval.

PLEASE TAKE FURTHER NOTICE that future dividend payments made to unsecured creditors under the Plan by the Trustee will also be made in accordance with the same pro-rata calculations as set forth in Exhibit A without further notice or Court approval unless subsequently modified in a later filed notice.

Date: February 19, 2025

Respectfully submitted,

/s/ Jolene E. Wee
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Post-confirmation Plan Trustee

EXHIBIT A

UNIMEX CORPORATION, INC. REORGANIZED DEBTOR
Case 20-12535-BFK, EASTERN DISTRICT OF VIRGINIA (ALEXANDRIA)
Updated Distributions to Class 3 Creditors under the Plan
Dated: February 18, 2025

Amount to be distributed to Class 3 creditors:

\$ 50,000.00

Class 3: Unsecured nonpriority claims (Based on Confirmed Plan, Docket No. 69, page 9)	Total claim	% of Total Claim	Pro-rata distribution	% of creditor's total claim
1. 5.11 Tactical, Inc.–Sch. F	\$ 196,912.58	17.48%	\$ 8,742.31	4%
2. Badger c/o CIT Group/Commercial Services, Inc.–POC #3 ¹	77,604.40	6.89%	3,445.40	4%
3. Belleville Boot Company–Sch. F	-	0.00%	-	n/a
4. Berne Apparel Company–Sch. F	14,907.80	1.32%	661.86	4%
5. Bill Page Plaza, LLC–POC #8 ²	125,985.61	11.19%	5,593.37	4%
6. Capital One Bank (USA), N.A.–POC #4	50,459.29	4.48%	2,240.24	4%
7. City Ocean Internat'l Inc. c/o Euler Hermes North America Ins. Co.–POC #7	13,553.00	1.20%	601.71	4%
8. Cobmex Apparel Ltd.–POC #13	18,326.00	1.63%	813.62	4%
8A. Cobmex Apparel Ltd.–POC #17 (withdrawn as a duplicate)	-	0.00%	-	n/a
9. Crown Lift Trucks–Sch. F	-	0.00%	-	n/a
10. DHL Express USA, Inc.–Sch. F	50,298.50	4.47%	2,233.10	4%
11. Echo Global Logistics–POC #1	-	0.00%	-	n/a
12. Export Corporation–POC #15	-	0.00%	-	n/a
13. Falcon Path LLC–POC #12 (withdrawn as a duplicate)	-	0.00%	-	n/a
13A. Falcon Path LLC–POC #14	399,462.00	35.47%	17,734.89	4%
14. First Tactical, LLC–Sch. F	-	0.00%	-	n/a
15. Howard Uniform–Sch. F	53,900.76	4.79%	2,393.03	4%
16. Kroll Internat'l, LLC–Sch. F	14,913.17	1.32%	662.10	4%
17. MSA Safety Sales, LLC–Sch. F	11,936.00	1.06%	529.92	4%
18. M&T Bank–POC #11 (PPP loan of \$75,636.58) ³	-	0.00%	-	n/a
19. PNC Bank–Sch. F	97,944.91	8.70%	4,348.45	4%
20. Proper Internat'l Sales–Sch. F	-	0.00%	-	n/a
21. Reeves Co.–POC #16 ⁴	-	0.00%	-	n/a
22. Spiewak c/o White Oak Commercial Finance–POC #6	-	0.00%	-	n/a
23. Timberland–Sch. F	-	0.00%	-	n/a
24. U.S. Small Business Admin.–Sch. F	-	0.00%	-	n/a
25. Uline–POC #2	-	0.00%	-	n/a
26. Under Armour–Sch. F	-	0.00%	-	n/a
27. Wolverine World Wide, Inc.–Sch. F	-	0.00%	-	n/a
28. Yangzhou Putian Shoemaking–Sch. F (loan of \$792,222.45) ⁵	-	0.00%	-	n/a
	\$1,126,204.02	100.00%	\$ 50,000.00	

Footnotes in the confirmed Plan and Plan Trustee's updates on certain claims:

¹ On January 17, 2023, the Court entered an Order approving the Plan Trustee's settlement with CIT. (Docket No. 195) CIT's allowed general unsecured claim in the total amount of \$77,604.40 will be transferred to the Plan Trustee, for the benefit of the bankruptcy estate. All future distributions from the Debtor due under its confirmed plan, that would have been made to CIT on account of its allowed claim shall be made to the Plan Trustee.

² Bill Page received a portion of its claim as an administrative expense so its Class 3 balance was reduced to \$125,985.61.

³ The payment of this PPP loan in favor of M&T Bank was forgiven on January 21, 2021. Therefore, even though POC #11 has not been formally withdrawn, the Debtor will not object to POC #11 but has simply deleted it from the list of Class 3 claims.

⁴ The debtor objected to this claim after the Plan was confirmed. On May 28, 2021, the Court entered an order and disallowed the claim in its entirety as an unsecured priority claim against the Debtor and its bankruptcy estate and the claim instead is allowed in its entirety as an unsecured nonpriority claim.

⁵ This creditor is owned by Mr. Jian's parents. In order to increase the percentage return to Class 3 creditors from approximately 6% to approximately 11%, it has agreed to withdraw its claim in this case. Rather than amending the Debtor's Schedule F on file with the Court to eliminate this claim, the Debtor has simply deleted it from the list of Class 3 claims.